

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Bair Hugger Forced Air Warming
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates To:
All Actions

**WORD COUNT COMPLIANCE
CERTIFICATE FOR
DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO
AMEND PRETRIAL ORDER
NO. 23**

I certify that Defendants' Response to Plaintiffs' Motion to Amend Pretrial Order No. 23 complies with the length limitations set forth in LR 7.1(f), as well as the type size requirements set forth in LR 7.1(h).

I further certify that in preparation of this memorandum, I used Microsoft® Office Word 2016, and the word processing program has an appropriate functioning word count tool applied specifically to include all text, including headings, footnotes, and quotations.

I further certify that the above-referenced memorandum contains 3,162 words.

Dated: October 3, 2018

Respectfully submitted,

s/Benjamin W. Hulse

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